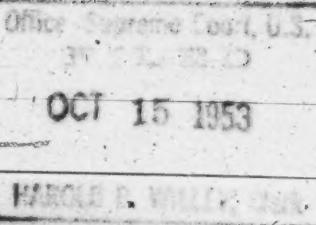


LIBRARY  
SUPREME COURT. U.S.



IN THE

Supreme Court of the United States

October Term, 1953

No. .... Original.

STATE OF ALABAMA,

Complainant,

vs.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;  
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS  
McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,  
Defendants.

Motion for Leave to File Objections and Brief in  
Opposition to Motion for Leave to File Complaint  
and for Oral Hearing.

RICHARD W. ENNIS  
Attorney General of Florida

HOWARD S. BAILEY  
Assistant Attorney General

FRED M. BURKS  
Assistant Attorney General

JOHN D. MORIARTY  
Special Assistant Attorney General  
Attorneys for Movant.

IN THE  
**Supreme Court of the United States**

October Term, 1953

No. .... Original.

**STATE OF ALABAMA,**

Complainant,

vs.

**STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;  
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS  
MCKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,**

Defendants.

**Motion for Leave to File Objections and Brief in  
Opposition to Motion for Leave to File Complaint  
and for Oral Hearing.**

The People of the State of Florida move for leave to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint, and, because of the length and complexity of the complaint and supporting brief, request that not less than thirty (30) days be allowed for such purpose.

-2-

The People of the State of Florida further move the Court to set said motion of the State of Alabama for an oral hearing after the filing of briefs.

RICHARD W. ENRICK

Attorney General of Florida

HOWARD S. BAILEY

Assistant Attorney General

FRANK M. BURNS

Assistant Attorney General

JOHN D. MORIARTY

Special Assistant Attorney General  
Attorneys for Movant.

October 14, 1953

I, Pauline H. Evans, being first duly sworn, certify that I am over the age of 18 years and not a party to the within action; that on October 14, 1953, I served a copy of the foregoing Motion upon each of the following named individuals by mailing a copy of the Motion to them, postage prepaid, at the following addresses:

Hon. Si Garrett  
Attorney General of Alabama  
State Capitol  
Montgomery, Alabama

Hon. John Ben Sheppard  
Attorney General of Texas  
State Capitol  
Austin, Texas

Hon. Fred S. Leblanc  
Attorney General of Louisiana  
State Capitol  
Baton Rouge, Louisiana

Hon. George M. Humphrey  
Secretary of the Treasury  
Department of the Treasury  
Washington, D. C.

Hon. Edmund G. Brown  
Attorney General  
State Capitol  
Sacramento, California

State of Florida, County of Leon—ss.

Subscribed and sworn to before me this 14 day of October, 1953.

*M. D. Phillips*

Notary Public, State of Florida at Large  
My commission expires July 15, 1958.  
Bonded by American Surety Co. of N. Y.

(Seal)

LIBRARY  
SUPREME COURT, U.S.

Office - Supreme Court, U.S.  
FILED  
OCT 5 1953  
HAROLD B. WILLEY, Clerk

IN THE

Supreme Court of the United States

October Term, 1953.

No. ...., Original.

STATE OF ALABAMA,

*Complainant,*

*vs.*

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,

*Defendants.*

Motion for Leave to File Objections and Brief in  
Opposition to Motion for Leave to File Complaint  
and for Oral Hearing.

EDMUND G. BROWN,

*Attorney General of California;*

WILLIAM V. O'CONNOR,

*Chief Deputy Attorney General;*

EVERETT W. MATTOON,

*Assistant Attorney General;*

GEORGE G. GROVER,

*Deputy Attorney General,*

600 State Building,

Los Angeles 12, California,

*Attorneys for Movant.*

IN THE  
**Supreme Court of the United States**

---

October Term, 1953.  
No. ...., Original.

---

**STATE OF ALABAMA,**

*Complainant,*

*vs.*

**STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,**

*Defendants.*

---

**Motion for Leave to File Objections and Brief in  
Opposition to Motion for Leave to File Complaint  
and for Oral Hearing.**

---

The People of the State of California move for leave to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint, and, because of the length and complexity of the complaint and supporting brief, request that not less than thirty (30) days be allowed for such purpose.

IN THE  
**Supreme Court of the United States**

October Term, 1953.  
No. ...., Original.

STATE OF ALABAMA,

*Complainant,*

*vs.*

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,

*Defendants.*

---

**Motion for Leave to File Objections and Brief in  
Opposition to Motion for Leave to File Complaint  
and for Oral Hearing.**

---

The People of the State of California move for leave to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint, and, because of the length and complexity of the complaint and supporting brief, request that not less than thirty (30) days be allowed for such purpose.

The People of the State of California further move the Court to set said motion of the State of Alabama for an oral hearing after the filing of briefs.

EDMUND G. BROWN,

*Attorney General of California;*

WILLIAM V. O'CONNOR,

*Chief Deputy Attorney General;*

EVERETT W. MATTOON,

*Assistant Attorney General;*

GEORGE G. GROVER,

*Deputy Attorney General,*

*Attorneys for Movant.*

By WILLIAM V. O'CONNOR,

October 2, 1953.

### Affidavit of Service.

I, Leilani Kroll, being first duly sworn, certify that I am over the age of 18 years and not a party to the within action; that on October 2, 1953, I served a copy of the foregoing Motion upon each of the following named individuals by mailing a copy of the Motion to them, postage prepaid, at the following addresses:

Hon. Si Garrett  
Attorney General of Alabama  
State Capitol  
Montgomery, Alabama

Hon. John Ben Sheppard  
Attorney General of Texas  
State Capitol  
Austin, Texas

Hon. Fred S. Leblanc  
Attorney General of Louisiana  
State Capitol  
Baton Rouge, Louisiana

Hon. Richard W. Ervin  
Attorney General of Florida  
State Capitol  
Tallahassee, Florida

Hon. George M. Humphrey  
Secretary of the Treasury  
Department of the Treasury  
Washington, D. C.

Hon. Douglas McKay  
Secretary of the Interior  
Department of the Interior  
Washington, D. C.

Hon. Robert B. Anderson  
Secretary of the Navy  
Department of the Navy  
Washington, D. C.

Hon. Ivy Baker Priest  
Treasurer of the United States  
Department of the Treasury  
Washington, D. C.

Hon. Herbert Brownell, Jr.  
Attorney General of the United States  
Department of Justice  
Washington, D. C.

LEILANI KROLL.

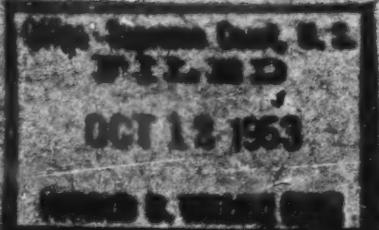
State of California, County of Los Angeles—ss.

Subscribed and sworn to before me this 2nd day of October, 1953.

KATHRYN BUCKMAN,

Notary Public in and for Said County and State.

LIBRARY  
SUPREME COURT, U.S.



IN THE  
Supreme Court of the United States

OCTOBER TERM, 1953  
No. \_\_\_\_\_, Original

STATE OF ALABAMA  
*Complainant,*

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF  
FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUM-  
PHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON;  
IVY BAKER PRIEST,

*Defendants.*

Motion for Leave To File Objections and Brief  
In Opposition to Motion for Leave To File  
Complaint and for Oral Hearing

JOHN BEN SHEPPARD  
Attorney General of Texas  
WILLIAM H. HOLLOWAY  
Assistant Attorney General

IN THE  
Supreme Court of the United States

OCTOBER TERM, 1953

No. \_\_\_\_\_, Original

STATE OF ALABAMA  
*Complainant,*

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF  
FLORIDA; STATE OF CALIFORNIA; GEORGE M. HUM-  
PHREY; DOUGLAS MCKAY; ROBERT B. ANDERSON;  
IVY BAKER PRIEST,

*Defendants.*

Motion for Leave To File Objections and Brief  
in Opposition to Motion for Leave To File  
Complaint and for Oral Hearing

The State of Texas, by its Attorney General, asks  
leave of the Court to file objections and a brief in  
opposition to the motion of the State of Alabama for  
leave to file a complaint, and, because of the com-  
plexity and length of the complaint and brief sub-  
mitted therewith, it is requested that not less than  
thirty (30) days be allowed the State of Texas for  
such purpose.

**The State of Texas further moves the Court to set  
Alabama's motion for leave to file a complaint for  
an oral hearing after the filing of briefs.**

---

**JOHN BEN SHEPPERD  
Attorney General of Texas**  
**WILLIAM H. HOLLOWAY  
Assistant Attorney General**

**October 12, 1953**

## Certificate of Service

I, William H. Holloway, certify that I have served a copy of the foregoing Motion upon each of the following named individuals by mailing a copy of same to them, postage prepaid, to the following addresses:

Hon. Si Garrett  
Attorney General of Alabama  
State Capitol  
Montgomery, Alabama

Hon. Douglas McKay  
Secretary of the Interior  
Department of the Interior  
Washington, D. C.

Hon. Edmund G. Brown  
Attorney General of California  
State Capitol  
Sacramento, California

Hon. Robert B. Anderson  
Secretary of the Navy  
Department of the Navy  
Washington, D. C.

Hon. Fred S. Leblanc  
Attorney General of Louisiana  
State Capitol  
Baton Rouge, Louisiana

Hon. Ivy Baker Priest  
Treasurer of the United States  
Department of the Treasury  
Washington, D. C.

Hon. Richard W. Ervin  
Attorney General of Florida  
State Capitol  
Tallahassee, Florida

Hon. Herbert Brownell, Jr.  
Attorney General of the  
United States  
Department of Justice  
Washington, D. C.

Hon. George M. Humphrey  
Secretary of the Treasury  
Department of the Treasury  
Washington, D. C.

WILLIAM H. HOLLOWAY

State of Texas, County of Travis

Subscribed and sworn to before me this \_\_\_\_\_ day  
of October, 1953.

Notary Public in and for  
Said County and State.

LIBRARY  
SUPREME COURT, U.S.

Office - Supreme Court, U. S.  
FILED  
OCT 14 1953  
HAROLD B. WILLEY, Clerk

IN THE  
Supreme Court of the United States  
OCTOBER TERM, 1953

No. . . . ., Original

STATE OF ALABAMA, Complainant,

v.

STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;  
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS  
McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,  
Defendants.

MOTION FOR LEAVE TO FILE OBJECTIONS AND BRIEF  
IN OPPOSITION TO MOTION FOR LEAVE TO FILE  
COMPLAINT AND FOR ORAL HEARING.

FRED S. LEBLANC,  
Attorney General,  
State of Louisiana;

JOHN L. MADDEN,  
Assistant Attorney General,  
State of Louisiana;

BAILEY WALSH,  
Special Assistant Attorney  
General,  
State of Louisiana.

IN THE  
**Supreme Court of the United States**

October Term, 1953

No. ...., Original

**STATE OF ALABAMA, Complainant,**

v.

**STATE OF TEXAS; STATE OF LOUISIANA; STATE OF FLORIDA;  
STATE OF CALIFORNIA; GEORGE M. HUMPHREY; DOUGLAS  
McKAY; ROBERT B. ANDERSON; IVY BAKER PRIEST,  
Defendants.**

**MOTION FOR LEAVE TO FILE OBJECTIONS AND BRIEF  
IN OPPOSITION TO MOTION FOR LEAVE TO FILE  
COMPLAINT AND FOR ORAL HEARING.**

The State of Louisiana, appearing herein through its Attorney General and acting pursuant to the authority vested in him by the constitution of said State, moves this Honorable Court for leave to file objections and a brief in opposition to the motion of the State of Alabama for leave to file a complaint in the above entitled matter.

The State of Louisiana represented as aforesaid suggests to the Court that the complaint above mentioned is highly complex and complicated and for such reason requests that it be allowed a period of not less than forty (40)

days for the purpose of preparing and filing such objections.

The State of Louisiana further moves the Court to set the motion of the State of Alabama for oral hearing after the filing of briefs.

FRED S. LEBLANC,  
*Attorney General,  
State of Louisiana;*

JOHN L. MADDEN,  
*Assistant Attorney General,  
State of Louisiana;*

BAILEY WALSH,  
*Special Assistant Attorney  
General,  
State of Louisiana.*

By

John L. Madden

October 13, 1953.

**Affidavit of Service**

I, John L. Madden, Assistant Attorney General of the State of Louisiana and of counsel for said State in the above and foregoing motion, being first duly sworn, certify that I have served a copy of said motion upon each of the following named persons by mailing a copy of the motion to them, postage prepaid, prior to the filing of said motion, and at the following addresses:

Hon. Si Garrett  
Attorney General of  
Alabama  
State Capitol  
Montgomery, Alabama

Hon. John Ben Shepperd  
Attorney General of Texas  
State Capitol  
Austin, Texas

Hon. Edmund G. Brown  
Attorney General of  
California  
State Building  
San Francisco, California

Hon. Richard W. Ervin  
Attorney General of  
Florida  
State Capitol  
Tallahassee, Florida

Hon. George M. Humphrey  
Secretary of the Treasury  
Department of the  
Treasury  
Washington, D. C.

Hon. Douglas McKay  
Secretary of the Interior  
Department of the Interior  
Washington, D. C.

Hon. Robert B. Anderson  
Secretary of the Navy  
Department of the Navy  
Washington, D. C.

Hon. Ivy Baker Priest  
Treasurer of the  
United States  
Department of the  
Treasury  
Washington, D. C.

Hon. Herbert Brownell, Jr.  
Atty. General of the  
United States  
Department of Justice  
Washington, D. C.

/s/ John L. Madden  
JOHN L. MADDEN

City of Washington, District of Columbia—ss:  
Subscribed and sworn to before me this 12th day of  
October, 1953.

BYRD C. REED  
Notary Public in and for  
Said City and District.